

FILED
CLERKS OFFICE

2006 OCT 30 P 2:41

U.S. DISTRICT COURT
DISTRICT OF MASS.

United States District Court
District of Massachusetts

ALICE COOPERSTEIN, EXECUTOR
OF THE ESTATE OF SHERWIN
COOPERSTEIN, ET AL

: CIVIL ACTION NO.
2004-12099GAO

VS.

:

ROBERT DAVIS, M.D., ET AL

:

OCTOBER 27, 2006

Plaintiff's Motion for Enlargement of Time for Completion of Discovery

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rules 7.1(a)(1), 16.1, and 26.2, the plaintiff, Alice Cooperstein, Executor of the Estate of Sherwin Cooperstein, and Alice Cooperstein, respectfully moves for an additional time in which to complete depositions. Despite the parties' diligent efforts, scheduling difficulties have created the need for more time to complete depositions.

The plaintiff requests that the Court permit the following revised deadlines:

1. Depositions of the plaintiffs' experts to be completed by December 31, 2006;
2. Depositions of the defendants' experts to be completed by February 8, 2007.

In support of their request, the plaintiffs represent:

1. On August 10, 2006, the plaintiffs disclosed their expert witness, Dr. Stephen Greenberg;

2. At about the same time as the disclosure, the plaintiff's expert relocated from Missouri to South Carolina. The plaintiffs' expert's relocation, coupled with the trial and other commitments of plaintiffs' counsel, have delayed the scheduling of Dr. Greenberg's deposition.

3. On September 12, 2006, the defendants disclosed their expert witnesses.

4. The trial and other commitments of plaintiffs' counsel have also delayed the scheduling of the defendants' experts' depositions.

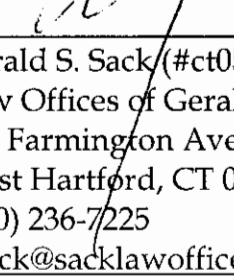
5. All fact witness discovery has been diligently conducted and completed.

6. Pursuant to Local Rule 26.2(c), plaintiffs' counsel certifies that counsel has made a good faith effort to reach an agreement with opposing counsel and the matters set forth in this motion.

Counsel for the defendant does not object, nor consent, to the granting of this motion.

This is the first such request for an enlargement of time.

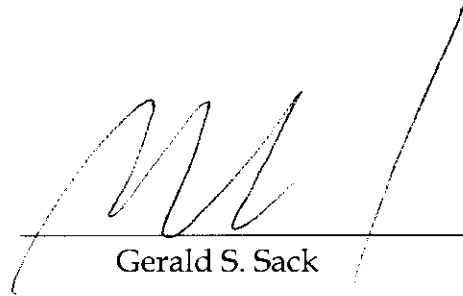
PLAINTIFFS:
ALICE COOPERSTEIN, EXECUTOR OF THE ESTATE
OF SHERWIN COOPERSTEIN, ET AL

By 
Gerald S. Sack (#ct05279)
Law Offices of Gerald S. Sack, LLC
836 Farmington Avenue
West Hartford, CT 06119
(860) 236-7225
gsack@sacklawoffice.com

CERTIFICATION

This is to certify that a copy of the foregoing was mailed on this 27TH day of October, 2006 to the following counsel of record:

Tanya Oldenhoff, Esq.
Sloane and Walsh
3 Center Plaza #850
Boston, MA 02108



Gerald S. Sack